

Kevin M. McDonough
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, NY 10020
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
E-mail: kevin.mcdonough@lw.com

Peter A. Wald (*pro hac vice*)
LATHAM & WATKINS LLP
505 Montgomery Street, Suite 2000
San Francisco, CA 94111-6538
Telephone: (415) 391-0600
Facsimile: (415) 395-8095
E-mail: peter.wald@lw.com

Christopher S. Turner (*pro hac vice*)
LATHAM & WATKINS LLP
555 Eleventh Street, Suite 1000
Washington, DC 20004-1304
Telephone: (202) 637-2200
Facsimile: (202) 637-2201
E-mail: christopher.turner@lw.com

Attorneys for Defendants Navient Corporation, John F. Remondi, Somsak Chivavibul, and Christian M. Lown

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE NAVIENT CORPORATION
SECURITIES LITIGATION

Case No. 1:17-cv-08373-RBK-AMD

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

ORAL ARGUMENT REQUESTED

Motion Day: November 1, 2021¹

¹ On July 29, 2021, the Parties filed a Joint Stipulation And Proposed Order Regarding The Briefing Schedule (the “Joint Stipulation And Proposed Order”) (D.I. 110). The Joint Stipulation And Proposed Order established a schedule governing the briefing of responses to dispositive motions and motions to exclude expert testimony, and the replies in further support of those motions. That schedule

TO: THE CLERK OF COURT AND COUNSEL OF RECORD

PLEASE TAKE NOTICE that November 1, 2021, at 9:30 a.m. or as soon thereafter as counsel may be heard, Defendants Navient Corporation (“Navient”), John F. Remondi, Somsak Chivavibul, and Christian M. Lown (collectively, “Defendants”) will move, by and through the undersigned attorneys, before the Honorable Robert B. Kugler, U.S.D.J., for an order pursuant to Federal Rule of Civil Procedure 56, granting Defendants’ Motion for Summary Judgment.

PLEASE TAKE FURTHER NOTICE that, in support of their motion, Defendants will rely upon the accompanying Opening Brief, Local Rule 56.1 Statement of Undisputed Material Facts, Declaration of Christopher S. Turner (and the exhibits attached thereto), as well as all pleadings and other documents filed with the Court in this matter.

Oral argument is requested.

Date: July 30, 2021

Respectfully submitted,

LATHAM & WATKINS LLP

provides that, should either party file a dispositive motion or motion to exclude expert testimony, the other party shall have until and including September 20, 2021 to oppose the motion, and the party who filed the motion should have until and including October 20, 2021 to file a reply in support of their motion. This Court has not yet entered an order granting the Joint Stipulation And Proposed Order.

By: /s/ Kevin M. McDonough
Kevin M. McDonough
1271 Avenue of the Americas
New York, NY 10020
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
Email: kevin.mcdonough@lw.com

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*Attorneys for Defendants Navient
Corporation, John F. Remondi,
Somsak Chivavibul, and Christian M.
Lown*